

Robert J. McNelly, Esquire
Attorney I.D. #84898
David B. Ermine, Esquire
Attorney I.D. #76874
Beth R. Stearns (*pro hac vice*)
McNelly Law Group
1415 S. Collegeville Road, Suite B
Collegeville, PA 19426
Phone (610) 331-0272
rmcnelly@mcnellylaw.com

Attorneys for Plaintiff, Sommer Miller

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

SOMMER MILLER	:	
	PLAINTIFF	:
		CIVIL ACTION
VS.	:	
		NO. 21-cv-619-CMR
	:	
THE CITY OF PHILADELPHIA, ET. AL	:	
	DEFENDANTS	:

JOINT REPORT OF RULE 26(f) MEETING

In accordance with Federal Rule of Civil Procedure 26(f), counsel for the parties conferred on May 7, 2021 and submit the following report of their meeting for the court's consideration:

1. Discussion of Claims, Defenses and Relevant Issues

Plaintiff provides a detailed account of the factual background that supports her claims within the Complaint itself.

Defendants deny Plaintiff's claims in their entirety.

2. Informal Disclosures

The parties will file and serve Rule 26 Disclosures prior to the Rule 16 Teleconference.

3. Formal Discovery

The parties have not exchanged formal discovery. Plaintiff is prepared to serve discovery within a week after the scheduled Rule 16 Teleconference.

120 days should be sufficient for discovery.

The parties will discuss issues pertaining to **electronic discovery shortly**.

4. Expert Witness Disclosures

It is premature to disclose expert witnesses at this stage of the litigation, but the parties do not foresee an issue with simultaneous exchange of reports after the conclusion of discovery.

5. Early Settlement or Resolution

The parties have had informal settlement discussions but have not yet discussed early resolution options under Local Rule 53.3.

6. Magistrate Jurisdiction

The parties are not willing to consent to Magistrate jurisdiction at this time.

7. Trial date

The parties will agree on a range shortly after the Rule 16 Teleconference.

8. Other Matters

None currently.

Respectfully submitted,

/s/

Robert J. McNelly, Esquire

Respectfully submitted,

/s/

Daniel R. Unterburger

Date: May 7, 2021

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